

**THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

**MIGUEL ANGEL DIAZ HERNANDEZ
MAYRA IVETTE HERNANDEZ FUENTES**

CASE NO.:10-04832

DEBTOR

CHAPTER 13

**APPLICATION FOR ADDITIONAL ATTORNEY FEES
ABOVE THE FLAT FEE AGREEMENT**

TO THE HONORABLE COURT:

I, Sonia A Rodriguez Rivera, Esquire, counsel for the Debtors herein, hereby apply for the approval of attorney's fees to be paid through the plan. This is a fee above and beyond the amount of the flat fee of \$3,000.00 disclosed in the Statement Pursuant to Rule 2016.

The amount requested is justified because it was necessary to defend the debtor's rights under the Bankruptcy Code and merited a modification of the Plan and amended schedules on July 20, 2011 and august 8, 2011 for a total amount of work of one 1/2 hours at the rate of \$200.00 for a total of \$300.00.

The amended plan was recommended favorably for confirmation on August 9, 2011.

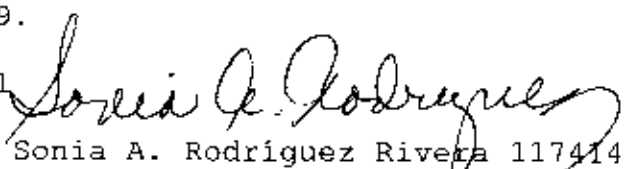
The services rendered as indicated, constitute additional work and \$300.00 are requested as additional attorney's fees for post confirmation additional legal work. The services needed were not and could not have been anticipated at the time of filing the

petition.

WHEREFORE, the Court is respectfully requested to enter an Order directing the Trustee to pay \$300.00 to the undersigned counsel for the Debtor in addition to the flat fee of \$3,000.00 previously approved in the Order Confirming Plan, as an administrative expense in the Debtor's Chapter 13 plan for the additional work performed beyond normal case preparation tasks.

CERTIFICATE OF SERVICE: I hereby certify that on September 13, 2011 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notifications of such filing to the following: José R. Carrión, Chapter 13 Trustee, and I further certify that I have mailed by Unites States Postal Service the document to the Debtors Miguel Angel Diaz Hernandez and Mayra Ivette Hernandez Fuentes at their HC 73 BOX 4369 , BO Achiote, Naranjito, PR 00719.

September 13, 2011


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Miguel Angel Diaz Hernandez
Mayra Ivette Hernandez Fuentes
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21 DAY NOTICE: Within twenty one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.